

SUPREME COURT: NEW YORK COUNTY

-----X  
CBS, INC.

Plaintiff

-against-

**COMPLAINT**

Index No.: 601018-07

COLLECTORS ART, INC., MARTIN HANCOCK,  
LINDA HANCOCK, NANCY A. ROSS &  
HIGH RIDGE PARTNERS, INC.

Defendants  
-----X

Plaintiff, complaining of the defendants, by it's attorney, Martin S. Cole, hereby alleges:

**AS AND FOR A FIRST CAUSE OF ACTION**

1. Plaintiff is a Delaware corporation, maintaining its offices and place of business in the City, County and State of New York and elsewhere in the United States.
2. This cause of action arose in the City, County and State of New York.
3. Defendant Collectors Art, Inc. is an Illinois corporation, maintaining its offices in the County of Cook, State of Illinois and also doing business in the State of New York.
4. Defendants Martin Hancock and Linda Hancock reside in the State of Illinois and are the principals, principal stockholders, officers and directors of Collectors Art, Inc., and were and are in control of the business, affairs and finances of said corporation.
5. Nancy A. Ross resides in the County of Cook, State of Illinois.
6. High Ridge Partners, Inc. is an Illinois Corporation, residing in the County of Cook, State of Illinois.
7. Defendant Ross was and is a principal, officer and director of High Ridge Partners, Inc.

8. Heretofore, and from January 1, 2007 to January 27, 2007, plaintiff rendered television advertising services to defendant Collectors Art, Inc. at the agreed price of \$214,990.00, no part of which has been paid although due and duly demanded.

9. By reason of the foregoing, plaintiff has sustained damages in the sum of \$214,990.00.

**AS AND FOR A SECOND CAUSE OF ACTION**

10. Plaintiff repeats and re alleges each and every allegation contained in paragraphs 1 through 9 of this complaint.

11. During the month of January 2007, defendant Collectors Art, Inc. was (and is) insolvent, and unable to pay its creditors, including plaintiff herein.

12. During said time, the Hancock defendants, as principals of Collectors Art, Inc., knew, or should have known, of the defunct and insolvent financial condition of Collectors Art, Inc., and that said corporation would be unable to pay its debts and obligations to its creditors, particularly including the plaintiff in this action.

13. Said individual defendants recklessly, negligently and fraudulently ordered and caused the said television advertising by the plaintiff to be rendered and utilized by Collectors Art, Inc., while having knowledge of the financial condition of Collectors Art, Inc., and knowing that said corporation would be unable to pay the plaintiff even as it ordered and received the television advertising services rendered by the plaintiff.

14. By reason of the foregoing, defendants Martin Hancock and Linda Hancock were and are personally liable to the plaintiff for the said obligation.

**AS AND FOR A THIRD CAUSE OF ACTION**

15. Plaintiff repeats and re alleges each and every allegation contained in paragraphs 1 through 14 of this complaint.


16. Defendants Nancy A. Ross and High Ridge Partners, Inc. have acted as an assignee for the benefit of creditors of Collectors Art, Inc.

17. Said defendants, despite knowing of the financial condition of Collectors Art, Inc., and despite their knowledge of the fraudulent and negligent obtaining of the services in question from the plaintiff at a time when said corporation was obviously insolvent and unable to pay its creditors, have contributed to the fraud practiced upon creditors by defendants Collectors Art, Inc., Martin Hancock and Linda Hancock.

18. By reason of the foregoing, and by reason of defendants Ross and High Ridge acting in concert with Collectors Art, Inc., Martin Hancock and Linda Hancock, the said defendants Ross and High Ridge were and are personally liable to the plaintiff for the said debts incurred by Collectors Art, Inc., Martin Hancock and Linda Hancock.

WHEREFORE, plaintiff demands judgment against defendants and each of them in the sum of \$214,990.00 with interest from January 27, 2007 and the costs and disbursements of this action.

Yours, etc.

  
MARTIN S. COLE  
Attorney for Plaintiff  
67 Wall Street - 22<sup>nd</sup> Floor  
New York, NY 10005-3111  
(212) 929-0606

Dated: March 19, 2007